



DEPARTMENT OF THE NAVY
PUGET SOUND NAVAL SHIPYARD
AND INTERMEDIATE MAINTENANCE FACILITY
1400 FARRAGUT AVENUE STOP 2090
BREMERTON WASHINGTON 98314-2090

IN REPLY REFER TO:

5090

Ser 106.32/318

SEP 07 2018

U.S. Environmental Protection Agency
Region 10
Attention: OCE-133
1200 Sixth Avenue, Suite 900
Seattle, WA 98101

Ladies and Gentlemen:

This letter serves to fulfill Part IV.G.2 of the Puget Sound Naval Shipyard and Intermediate Maintenance Facility (PSNS & IMF) National Pollutant Discharge Elimination System Permit, Number WA-000206-2. Between May 20, 2016 and September 5, 2018, an estimated 452,520 gallons of domestic wastewater entered Sinclair Inlet near the southwest corner of Drydock 4.

After following a lead based on monthly water quality sampling performed on August 22, 2018, domestic wastewater was discovered to be entering the stormwater system at 7 a.m. on September 5, 2018. PSNS & IMF worked with Naval Facilities Engineering Command Northwest (NAVFAC NW) Public Works Department Kitsap (PWDK) to locate the source of the spill. By 12 p.m., NAVFAC NW PWDK stopped the spill and began pumping the domestic wastewater from the stormwater system to the sanitary sewer system. On September 5, 2018, verbal notifications were made to the Environmental Protection Agency and Washington Department of Ecology. On September 7, 2018, verbal notifications to the Environmental Protection Agency and Washington Department of Ecology were updated to reflect the discovery of the start date and cause of the spill. The spill was caused by an unintended wastewater connection to the stormwater system during the installation of temporary facilities in 2016. A permanent re-route of the unintended connection is being coordinated with NAVFAC NW PWDK and will be completed as soon as possible. NAVFAC NW PWDK will continue to pump the domestic wastewater to the sanitary sewer system until these repairs are complete. An investigation of construction and contracting processes is in progress to find and correct deficiencies that contributed to this incident.

Questions or comments regarding this information may be addressed to Mr. Trevor Richardson, Code 106.32, at (360) 476-0118.

Sincerely,

C. S. MATHESON
Head, Environmental Division
Occupational Safety, Health and Environment Office
By direction
of the Commander

Copy to: WDOE, NW Regional Office



1786 SE Mile Hill Dr.
Port Orchard, WA 98366
(360) 443-7845

Analytical Report

PSNS&IMF c/106.32
1400 Farragut Ave
Bremerton, WA 98314

Project Fecals
Date Received 08/29/2018

Analyte: Fecal Coliform
Method: SM 9222 D

Date Analyzed: 8/29/2018
Analyst: LB

Sample No.	Client ID	Result	Qualifiers	Units	RL:	Sampled	Matrix
104288-01		54		CFU/100ml	1	08/29/18	Marine Water
104288-02		320000		CFU/100ml	1	08/29/18	Surface Water

Lab Qualifiers Comments:

Project: Compliance Sampling - 18M01GH (Kane Environmental), WO/PO#: 75000-18M01GH					M= 1, 10, 100; NS= 10, 100, 1000, SW= 100, 1000, 10000		Date: 8/29/18	
Sampling Team:					Sample Type	MPN Fecal Coliform	Dilution Reported 1/ (Specify Ratio)	Sample Type
Results To: daniel.j.bunch@navy.mil, neverson@kane-environmental.com, paul.caswell@navy.mil								
FAX: 360-476-9082								
Phone: 360-476-6614								
Sample Type: Freshwater (FW) Nearshore (NS) Marine (M) Stormwater (SW); M= 1, 10, 100; NS= 10, 100, 1000; SW= 100, 1000, 10000					ID: FC-8-29-18 Cetric Analytical Laboratories 1786 Mile Hill Dr. Port Orchard, WA 98366 (509) 844-6597 FAX (360) 282-6847 james@centricanalytical.com NAVFAC NW - NBK Bremerton Environmental 467 W Street, 4th Floor Bremerton, WA 98314			
#	Sample ID	Sample Date:Time	Lab ID #	Results				Notes & Comments
1	PS-09 NS	8/29/18 1335	10428501	54	NS	X	9	
2	PS-096	8/29/18 1345	↓ -02	310000	SW	X	10000	
3								
4								
5								
6								
7								
8								
9								
10								
11								
12								
13								
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15								
16								
17								
18								
19								
20								
21								
22								
23								
24								
25								
26								
27								
Relinquished by:		Date/Time 8/24/18 1502	Location Port Orchard	Plated Date/Time 8/29/18 1726		For Lab Use		
Received by:		Date/Time 8/29/18 1502	Location Centric	Read Date/Time 8/30/18 1100				
Received by:		Date/Time	Location					

Notes:

EMERGENCY SPILL REPORT*Initial notification must not be delayed pending collection of all information*

NAME AND PHONE NUMBER OF PERSON COMPLETING FORM	Justin Hubbs (b) (6)
Date & Time Form Completed/Updated	9/5//2018 0950
REPORTER INFORMATION	
Date and Time Initial Spill Report Received	9/5/2018 0700 (use 24 hour time)
REPORTER'S NAME (LAST, FIRST)	PAUL CASWELL
REPORTER'S PHONE NUMBER	360-476-5728
Code, Shop, Company, Squadron, or Department	PSNS, 106.32
Position	
Reporter's Location	Building # and Street: Bldg 427, Farragut Ave
	City: Bremerton
	State and Zip Code: Wa, 98314
INCIDENT DESCRIPTION	
MATERIAL RELEASED: Attach MSDS if available	<input type="checkbox"/> Oil/Fuel Type of Fuel _____ Domestic Wastewater <input type="checkbox"/> Hazmat/Unknown Chemical Name & CHRIS Code _____
	Is material a CERCLA Hazardous Substance? <input type="checkbox"/> Yes <input type="checkbox"/> No Is material an Extremely Hazardous Substance? <input type="checkbox"/> Yes <input type="checkbox"/> No
	Best Estimate of Quantity Released to Land _____ (include units, in gallons or lbs.) Best Estimate of Quantity Released to Water <u>unknown</u> (include units)
	Is material still being released Yes <input checked="" type="checkbox"/> No Current Spill Rate <u>None</u>
TYPE OF INCIDENT (CHECK ALL THAT APPLY)	<input type="checkbox"/> Inside building or containment area <input type="checkbox"/> Flightline <input type="checkbox"/> Soil <input checked="" type="checkbox"/> Navigable Water (freshwater, marine, wetland, storm drain) <input type="checkbox"/> Release to sanitary sewer <input type="checkbox"/> Fire <input type="checkbox"/> Explosion <input type="checkbox"/> Air Release
SOURCE AND CAUSE OF INCIDENT	Domestic wastewater was discovered to be entering Sinclair Inlet through the Naval Base Kitsap – Bremerton storm sewer system at 0700 on 9/5.
	The location of domestic wastewater infiltration into the storm sewer system has been located, the specific cause will be confirmed upon excavation of the site.
DATE AND TIME OF INCIDENT	Unknown start date, discovered 9/5 0700 (use 24 hour time)
INCIDENT ADDRESS/LOCATION	Naval Base Kitsap: 120 South Dewey St Building 443
(include state and zip code)	Bremerton Wa 98314
County	
Nearest City & Distance from City (miles)	
Latitude (for marine spills)	___ Degrees ___ Minutes ___ Seconds
Longitude (for marine spills)	___ Degrees ___ Minutes ___ Seconds
Container Type & Capacity (include units)	
Permit Number	WA-000206-2

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Weather Conditions	
Wind speed and direction; Temperature,	
Precipitation Rate and Type;	
Sea State/Wave/Current Information (marine spills)	
Slick size and description (marine spills)	
RESPONSE ACTIONS	
Initial Actions Taken	
1. Consider the following: <ul style="list-style-type: none"> • Spill volume; • Slick size; • Wind; • Tides/currents; • Product type(s); • Environmental sensitivities; and • Responder ability to contain, protect, and recover. 	
2. Locate reporting party.	
3. Establish initial command post location.	
4. Assign recorder.	Note response team arrival times, critical events. Initiate ICS 201 Form.
5. Rescue any injured individuals.	
6. Secure spill area and determine need for evacuation.	
7. Stop spill source, if not already accomplished.	
8. Complete initial site and material hazard assessments, including surveying area for danger to the public, water intakes, wildlife and environment.	
9. Prepare site maps.	
10. Establish hot/warm/cold/safe zones	Note times set up and removed.
11. Prevent spill from spreading.	
Actions Taken to Stop Release	The spill was stopped at 1200 9/5 when the stormwater vault with domestic wastewater inflow was pumped down below the overflow level stopping flow to Sinclair inlet. The vault will remain pumped down until repairs are completed.
Actions Taken to Contain Release	N/A
Actions Taken to Clean Up Release	N/A

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IMPACT/HEALTH THREATS	
NUMBER OF INJURIES	
NUMBER OF DEATHS	
EVACUATION(S) REQUIRED	<input type="checkbox"/> Yes X NO
Description of Areas to be Evacuated and Areas Already Evacuated including Number Evacuated	
Was There Any Property Damage? If so, describe	<input type="checkbox"/> YES X NO
Damage in Dollars (estimated)	
NATURAL RESOURCE DAMAGE IMPACTS	
Name of Surveyor	
Rank/Rate	
Command and Code	
Phone and email	
DESCRIPTION OF ENVIRONMENTAL	Sinclair Inlet
IMPACTS INCLUDING	
AREAS THREATENED	
ENVIRONMENT AND WILDLIFE EXPOSED	NA
TO OHS	
OPERATIONS UNDERTAKEN TO MINIMIZE	NA
DAMAGE TO NATURAL RESOURCES	
HEALTH THREATS AND PRECAUTIONS TO	Informed Kitsap County Health District
MINIMIZE HEALTH THREATS TO LOCAL	
RESIDENTS INCLUDING MEDICAL ADVICE	
Additional Information Any information about the incident not recorded elsewhere in the report, including corrective actions	

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taken. Attach documentation of personnel responding, including names, positions, and organizations.			
Final reported quantity	540 gallons/day		
Amount recovered: Keep material recovered from water separate from material recovered from other areas	Skimmers _____ Pads _____ Other _____		
NRDA Documentation submitted to WDOE	<input type="checkbox"/> YES	<input checked="" type="checkbox"/> NO	DATE: _____
15 Day Letter submitted to EPA and WDOE (for any reportable hazardous material releases)	<input type="checkbox"/> YES	<input checked="" type="checkbox"/> NO	DATE: _____
AGENCY NOTIFICATIONS			
NOSC 360-340-55991 or 360-396-0222	<input type="checkbox"/> YES	<input checked="" type="checkbox"/> NO	TIME: _____
NRC 1-800-424-8802	<input type="checkbox"/> YES	<input checked="" type="checkbox"/> NO	NRC Call No. _____ TIME: _____ Person receiving call _____
Washington Department of Emergency Management 1-800-258-5990	<input checked="" type="checkbox"/> YES	<input type="checkbox"/> NO	TIME: 1739 Report number 18-3395
USCG Sector Seattle 206-217-6002	<input type="checkbox"/> YES	<input checked="" type="checkbox"/> NO	TIME: _____
EPA Region 10 EPA Hotline: 206-553-1846 Leave name, phone number, NPDES permit # and spill details. Letter to EPA should follow within 5 days.	<input checked="" type="checkbox"/> YES	<input type="checkbox"/> NO	TIME: 1810
Washington Department of Ecology NWRO 425-649-7000 (Notification to WDEM sufficient after hours)	<input checked="" type="checkbox"/> YES	<input type="checkbox"/> NO	TIME: 1750
County Emergency Management Division Kitsap County DEM: 360- 307-5871 (select 9 after-hours)	<input checked="" type="checkbox"/> YES	<input type="checkbox"/> NO	TIME: 1756 through CENCOM
County Health District Kitsap County Public Health District: (360) 728-2235, or after hours CENCOM at (360) 307-5910 Speak to Floor Supervisor.	<input checked="" type="checkbox"/> YES	<input type="checkbox"/> NO	TIME: 1756 through CENCOM
Local Tribe Suquamish: Office: 360-394-8507 Cell: 360-271-4403; or CENCOM at 360-307-5910 and ask to speak to Suquamish PD Officer	<input type="checkbox"/> YES	<input type="checkbox"/> NO	TIME: 1745 by NBK Env.
Wastewater Treatment Plant Bremerton Wastewater Treatment Plant: 360-473-5400. After hours call CENCOM 360-307-5910	<input type="checkbox"/> YES	<input checked="" type="checkbox"/> NO	TIME: _____
Washington Department of Fish & Wildlife 360-534-8233 (Pager) Enter your phone number	<input type="checkbox"/> YES	<input checked="" type="checkbox"/> NO	TIME: _____
Local Air Pollution Control Agency Puget Sound Clean Air Agency (PSCAA): 1-800-552-3565	<input type="checkbox"/> YES	<input checked="" type="checkbox"/> NO	TIME: _____
Other (List) CNRNW	<input checked="" type="checkbox"/> YES	<input type="checkbox"/> NO	TIME: 1737
Navy Message Sent	<input checked="" type="checkbox"/> YES	<input type="checkbox"/> NO	DTG: 060214Z SEP 18
INTERNAL FACILITY NOTIFICATIONS (Activity Specific Requirements)			
Safety Office	<input checked="" type="checkbox"/> YES	<input type="checkbox"/> NO	TIME: 1300
SYWO or CDO PSNS	<input checked="" type="checkbox"/> YES	<input type="checkbox"/> NO	TIME: 1733
Commanding Officer NBK CDO	<input checked="" type="checkbox"/> YES	<input type="checkbox"/> NO	TIME: 1731

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Public Affairs 360-476-7111	X YES <input type="checkbox"/> NO TIME: 1525
Office of Counsel Wendy M. Kelly, Attorney. C/107 360-476-6597 or 360-476-4500	X YES <input type="checkbox"/> NO TIME: 1400
POC for further spill clean up info:	Justin Hubbs 360-535-2888
Copy to: NRNW N40 by close of business on next business day following release notification Date and Time sent to NOSC:	
<u>Desc.spillreports@dla.mil</u> for all spills involving DLA-owned product	

OUTSIDE AGENCY SPILL NOTIFICATIONS

TYPE OF SPILL AND CONDITIONS					
AGENCIES TO NOTIFY	OIL DISCHARGE TO WATER (1)	HAZARDOUS SUBSTANCES/ DANGEROUS/ TOXIC WASTES (2)/ OTHER OFF-SITE RELEASES	NPDES/ WATER PERMIT VIOLATIONS (3)	WATERWAY SEWAGE SPILLS	AIR RELEASE (4)
National Response Center (NRC) (5) 1-800-424-8802	Visible Sheen of Oil	>40 CFR 302 Reportable Quantity or Threat to Human Health or the Environment	None	None	Threat to Human Health or the Environment
WA Department of Emergency Management (6) 1-800-258-5990	Visible Sheen of Oil	Threat to Human Health or the Environment or >40 CFR 302 Reportable Quantity	Threat to Human Health or the Environment	Threat to Human Health or the Environment	Threat to Human Health or the Environment
US Coast Guard Sector Seattle 206-217-6002 or 206-217-6066	Visible Sheen of Oil	None	If Assistance is Required	None	None
EPA Region X Federal Facilities Manager 206-553-1263	None; SPCC Plan information submitted within 60 days.	>40 CFR 302 Reportable Quantity	None	None	Threat to Human Health or the Environment
EPA Region X Hotline 260-553-1846 Leave message including NPDES permit number within 24 hours of spill. Letter to EPA should follow within 5 days	NPDES Permit Violation	>40 CFR 117 or 40 CFR 302 Reportable Quantity into Receiving Waters	If NPDES Permit Conditions are Violated	Threat to Human Health or the Environment or Violation of NPDES Permit; for PSNS/NSB, >100 Gallons	None
EPA Region X Pesticides and Toxic Substances Branch (8) 206-553-1918	None	Any Release of PCBs to Water and Land-based spills of ≥ 10 pounds of ≥ 50 ppm PCBs	Any Release of PCBs to Water	None	None
WA Department of Ecology, Northwest Regional Office Spill/Compliance Section (9) 425-649-7000. Notification to WDEM sufficient after hours	Visible Sheen of Oil	Threat to Human Health or Environment or >40 CFR 302 Reportable Quantity	None	Threat to Human Health or the Environment	Threat to Human Health or the Environment
WA Dept. Of Ecology, Northwest Regional Office Water Quality Section 425-649-7025 Within 24 Hours	None; May need follow-up permit violation reporting	BMP Discrepancy; Notify Facility Program Manager Also	If State Waste Discharge Permit Conditions are Violated	None	None
County Department of Emergency Management (10) Island County Emergency Services 360-678- 4422 (ext. 572) Jefferson County DEM: 360-385-3831 Kitsap County DEM: 360-307-5871 or after hours CENCOM at 360-307-5910 (ask for supervisor) Snohomish County DEM: 425-423-7635	Any Spill Reported to Outside Agencies	Any Spill Reported to Outside Agencies or Threat to Human Health or the Environment.	Any Spill Reported to Outside Agencies	Any Spill Reported to Outside Agencies	Threat of, or Release Offsite or Offsite Impact
Commander Navy Region Northwest 360-315-5122/5123	Any Spill Reported to an Outside Agency	Any Spill Reported to an Outside Agency	Any Spill Reported to an Outside Agency	Any Spill Reported to an Outside Agency	Any Release Reported to an Outside Agency

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TYPE OF SPILL AND CONDITIONS					
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Local Tribe (11) Suquamish: Office: 360-394-8507 Cell: 360-271-4403; or CENCOM at 360-307-5910 and ask to speak to Suquamish Police Officer	Threat to tribal lands or natural resources; typically >10 gallons	Threat to Tribal Lands or Natural Resources	Threat to Tribal Lands or Natural Resources	Threat to Tribal Lands or Natural Resources; Check Permit Requirements Also	Threat to human health or the environment
National Oceanic and Atmospheric Administration (NOAA) (12) (206) 526-6317	If Assistance Required to Plot Trajectory of Spill Movement	Can provide technical assistance with HAZMAT spill response	Can provide technical assistance with HAZMAT spill response	None	None
Local Health District Kitsap County Public Health District: 360-337-5674/5235. After Hours call CENCOM 360-307-5910	Threat to Human Health or the Environment	Threat to Human Health or the Environment	Threat to Human Health or Environment	Threat to Human Health or Environment	Threat of, or Release Offsite or Offsite Impact
Local Wastewater Treatment Plant (13) Bremerton Wastewater Treatment Plant: 360-473-5400. After hours call CENCOM 360-307-5910	If oil spill threatens treatment plant.	Release to treatment plant exceeds reportable quantities	Release to treatment plant exceeds discharge standards and/or release violates general or specific prohibitions in 40 CFR 403.5	None	None
Local Air Pollution Control Agency Puget Sound Clean Air Agency (PSCAA): 1-800-552-3565	N/A	Violation of Air Quality Standard, Asbestos Release, or if Odor Complaints are Possible	None	None	Violation of Air Quality Standard, Asbestos Release, or if Odor Complaints are Possible
WA State Department of Fish & Wildlife - Region 6 (360) 534-8233 (Pager) enter your phone #	Wildlife Rescue or Habitat Assistance Required	Wildlife Rescue or Habitat Assistance Required	Wildlife Rescue or Habitat Assistance Required	Wildlife Rescue or Habitat Assistance Required	Wildlife Rescue or Habitat Assistance Required

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TYPE OF SPILL AND CONDITIONS					
AGENCIES TO NOTIFY	OIL DISCHARGE TO WATER (1)	HAZARDOUS SUBSTANCES/ DANGEROUS/ TOXIC WASTES (2)/ OTHER OFF-SITE RELEASES	NPDES/ WATER PERMIT VIOLATIONS (3)	WATERWAY SEWAGE SPILLS	AIR RELEASE (4)
<p>(1) Federal reporting requirements for oil are contained in 40 CFR 110.6. Oil discharges to land are not reportable unless they are a threat to navigable waters.</p> <p>(2) Hazardous Substances are defined in 40 CFR 300.5. Reportable quantities are contained in 40 CFR 302.6 (for releases to land, air, or water), and do not apply to releases solely to personnel within a facility, and 40 CFR 117.3 (for releases to water). Hazardous/Dangerous Wastes are defined in WAC 173-303-040 and include non-waste "hazardous substances" (Note: Department of Ecology's Dangerous Waste definition of Hazardous Substances different from the definition in 40 CFR 300.5.)</p> <p>(3) The Federal NPDES program is in 40 CFR 122. The State Waste Discharge Program is in WAC 173-216. Includes sewage spills and spills of other materials that are neither oil nor hazardous substances if a water permit violation results from the spill. Spills that result in a release into receiving waters from a storm drain, dry dock drainage, or other regulated source are also to be reported in the facility's monthly Discharge Monitoring Report.</p> <p>(4) Reporting to Air Pollution Control Agencies is required by local air pollution regulations (NWAPA Regulation Section 340, PSCAA Regulation Section 340) and WDOE Dangerous Waste regulations WAC 713-303-145.</p> <p>(5) Reporting to NRC required by National Contingency Plan (40 CFR 300).</p> <p>(6) Reporting to Washington Emergency Management Division is required by EPCRA (40 CFR 355.40) and by Washington State Statute RCW 90.56.280.</p> <p>(7) Reporting to EPA Water Compliance Section required by 40 CFR 122 (for federal NPDES stormwater or wastewater permit violations).</p> <p>(8) Reporting of PCB spills to EPA Toxic Substances Branch required by 40 CFR 761.</p> <p>(9) Reporting of oil and hazardous substance spill to Department of Ecology required by MTCA (WAC 173-340). Reporting of State Waste Discharge Permit Violations required by WAC 173-216. Reporting of UST releases required by WAC 173-360. Reporting of dangerous waste spill required by WAC 173-303.</p> <p>(10) Reporting to county emergency management divisions (Island County Emergency Services, Jefferson County EMD, Kitsap County DEM, Snohomish County DEM) required by EPCRA (40 CFR 355.40), WDOE Dangerous Waste regulations WAC 713-303-145, the NW Area Contingency Plan, and as needed to coordinate response.</p> <p>(11) Reporting to the Tribes required by EPCRA (40 CFR 355.40) and as needed to coordinate spill response.</p> <p>(12) Coordination with NOAA as necessary for assistance with oil and hazardous substance spill response.</p> <p>(13) Reporting to Treatment Plant required if spill into the sanitary sewer violates the general or specific prohibitions in 40 CFR 403.5 or a State Waste Discharge Permit requirement.</p>					

September 2018 Domestic Wastewater Spill

August 22, 2018: Monthly near shore sampling conducted by Code 106.

August 27, 2018: Sample results came back showing high fecal coliform levels in the vicinity of dry-dock 4. PWD and Code 106 scheduled follow-up samples in the near shore area and the first manhole in the stormwater line.

August 29, 2018: Follow-up samples taken.

September 5, 2018: Sample results revealed high fecal coliform levels (0700). PWD and Code 106 followed the stormwater line looking for evidence of the source and discovered a manhole northeast of building 1106 with a very strong sewage smell. Storm sewer vault was pumped down to maintain level below overflow level to stop the spill (1200). Source suspected to be misaligned piping. Regulators notified (1730).

September 6, 2018: Source determined to be from to be from the unintended connection of a domestic wastewater line belonging to a temporary structure to the stormwater system on May 20, 2016.

September 7, 2018: Called regulators with updated source and timeline.

September 8, 2018: Domestic wastewater line rerouted to the wastewater system and confirmed to be divorced from stormwater by dye testing.

September 12, 2018: All temporary structures inside and outside CIA verified properly connected by dye testing.

Contract requires them to smoke test & dye test
Contractor did not perform those actions
↳ checked this contractor's work to verify there
were no other cross connections
↳ checked any recent construction connections across
the page

